

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of portions of Timothy Ulatowski's deposition, taken on July 7, 2017 in Arlington, VA.
3. Attached hereto as Exhibit 2 is a true and correct copy of Timothy Ulatowski's Expert Report.
4. Attached hereto as Exhibit 3 is a true and correct copy of 3M internal document bearing bates range 3MBH00047439-42.
5. Attached hereto as Exhibit 4 is a true and correct copy of 3M internal document bearing bates range 3MBH01696526-27.
6. Attached hereto as Exhibit 5 is a true and correct copy of 3M internal document bearing bates range 3MBH0090030-31.

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman (MN#330292)
MESHBESHER & SPENCE, LTD.
1616 Park Avenue
Minneapolis, MN 55404
Phone: (612) 339-9121
Fax: (612) 339-9188
Email: gzimmerman@meshbesh.com

Plaintiffs Co-Lead Counsel